

Blue = withhold or redact

FOIA-EPA-R9-2016-003632

| Doc ID                          | Pages   | FOIA Exemption  | Doc Description  |
|---------------------------------|---------|---|--|
| LND-16-003632-CAD981412828-9A-1 | 19      | 5 – work product, deliberative process                            | “Sunkist Penalty Calcs”  |
| LND-16-003632-CAD981412828-9A-1 | 134-35  | 5 – work product, deliberative process                            | “Sunkist Penalty Calcs”  |
| LND-16-003632-CAD981412828-9A-1 | 321     | 5 – work product, deliberative process                            | Email transmitting (w/o attachment) draft complaint, discusses violations and penalty calculation          |
| LND-16-003632-CAD981412828-9A-1 | 474-75  | 5 – work product, deliberative process                            | “Sunkist Penalty Calcs”  |
| MISC                            | 1       | 4,5 – Financial Information                                       | Payment of penalty to EPA  |
| MISC                            | 2-4     | 5 – work product, deliberative process, attorney-client privilege | EPA memo in support of RCRA CA/FO (labeled “Enforcement Confidential/ AC Privilege”                        |
| MISC                            | 39      | 4,5 – Financial Information                                       | Wire transfer receipt for payment of penalty to EPA (includes bank routing numbers)                        |
| MISC                            | 52-65   | 5 – work product, deliberative process, attorney-client privilege | “Enforcement Confidential” Memo in support of Administrative Order under RCRA, including penalty worksheet |
| MISC                            | 67-69   | 5 – work product, deliberative process, attorney-client privilege | SEP analysis for enforcement memo  |
| MISC                            | 72-73   | 5 – work product, deliberative process                            | Sunkist penalty calcs  |
| MISC                            | 126-127 | 5 – work product, deliberative process, attorney-client privilege | SEP analysis for enforcement memo  |

|               |         |   |   |
|---------------|---------|---|---|
| MISC          | 137-144 | 4,5 – privileged settlement communication           | Transmittal of proposal for SEP and supporting information, labeled “confidential”  |
| MISC          | 193     | 6 – residential phone numbers                       | Emergency contact sheet   |
| MISC          | 204-206 | 6 – residential phone numbers                       | Emergency Contact list contained in Emergency Response Plan- names and phone numbers, labeled “Confidential”                                |
| MISC          | 261-62  | 5 – deliberative process, attorney-client privilege | Labeled “privileged/confidential/do not release under FOIA” – standard form specifying Office of Regulatory Enforcement involvement in case |
| NS-12-06-1999 | 14-16   | 6 – residential phone numbers                       | Emergency Contact list contained in Emergency Response Plan- names and phone numbers, labeled “Confidential”                                |